

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**UNITED STATES OF AMERICA ex rel.  
CAMERON JEHL,**

**Plaintiffs,**

**v.**

**GGNSC SOUTHAVEN LLC D/B/A  
GOLDEN LIVING CENTER-  
SOUTHAVEN et al.**

**Defendants.**

Case No. 3:19cv091-NBB-JMV

**DEFENDANTS GGNSC SOUTHAVEN LLC, GGNSC ADMINISTRATIVE SERVICES  
LLC, AND GGNSC CLINICAL SERVICES LLCs' RESPONSE IN OPPOSITION TO  
RELATOR'S MOTION TO RECONSIDER ORDER FINDING THAT THIS CASE IS  
FRIVOLOUS AND GRANTING ATTORNEYS' FEES TO DEFENDANTS**

Defendants GGNSC Southhaven LLC, GGNSC Administrative Services LLC, and GGNSC Clinical Services LLC respectfully submit their Joint Response in Opposition to Relator's Motion to Reconsider Order Finding That This Case Is Frivolous and Granting Attorneys' Fees to Defendants.

The Motion is supported by the supporting Memorandum of Law filed herewith.

Date: April 24, 2023

Respectfully submitted,

/s/ Margaret Sams Gratz

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**Administrative Services LLC; GGNSC**  
**Clinical Services**

**CERTIFICATE OF SERVICE**

This is to certify that I, Robert Salcido, one of the attorneys for GGNSC Southaven, LLC individually and on behalf of all Defendants have this day furnished a true and correct copy of the above and foregoing **RESPONSE IN OPPOSITION TO RELATOR'S MOTION TO RECONSIDER ORDER FINDING THAT THIS CASE IS FRIVOLOUS AND GRANTING ATTORNEYS' FEES TO DEFENDANTS** to the following via ECF filing:

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This 24th day of April, 2023.

/s/ Robert Salcido  
ROBERT SALCIDO